

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

| | | |
|---------------------------|---|------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| -vs- |) | Case No. 23-CR-235-GKF |
| |) | |
| TAUSHA MICHELLE SWARER, |) | |
| |) | |
| Defendant. |) | |

UNOPPOSED MOTION FOR CONTINUED SCHEDULING ORDER

Defendant, Tausha Michelle Swarer, by and through undersigned counsel, respectfully moves the Court to continue the scheduling order herein for 8/7/24 at 2:00 p.m. (Doc. #57) for a period of sixty (60) days upon the following grounds:

1. The parties believe the case is best suited to disposition by plea rather than trial.
2. The government will require a brief amount of time to finalize a proposed plea offer/ agreement.
3. Co-defendant Nicholas Lawrence Guilfoyle has previously entered a plea January 25, 2024 and co-defendant Arthur Edward Suarez has not yet been located.
4. Additional time is required for continuing negotiations with counsel for the government as to an agreed disposition to this case.
5. Due to defense counsel's previously scheduled Jury Trial August 2024 counsel estimates sixty (60) additional days will be sufficient for the parties to negotiate and finalize a written plea agreement.

6. It is respectfully urged that the ends of justice served by the requested continuance outweigh the best interests of the public and Defendant in a speedy trial. *See* 18 U.S.C. §3161(h)(7)(A).
7. It is further respectfully urged that a denial of the requested continuance would result in irreparable prejudice to the Defendant by denying counsel the reasonable time necessary for effective preparation taking into account the exercise of due diligence. *See, Id.* at §3161(h)(7)(b)(iv).
8. The government, by and through Assistant U.S. attorney Adam Bailey has no objection to the requested continuance.
9. The executed Speedy Trial Waiver is to be filed contemporaneously herewith.
10. This Motion is submitted in good faith and not for the purpose of delay.

WHEREFORE, premises considered, defendant Tausha Michelle Swarer respectfully requests the Court grant the requested continuance of the Scheduling Order for a period of sixty (60) days for good cause shown.

Respectfully Submitted,

s/ Marny Hill

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COUNSEL OF RECORD FOR

DEFENDANT TAUSHA MICHELLE SWARER

CERTIFICATE OF SERVICE

I certify that on the 2nd day of August, 2024, a true and correct copy of the foregoing was served upon:

Adam Bailey
Assistant U.S. Attorney

Joel-lyn McCormick
Assistant U.S. Attorney

Niko Boulieris
Assistant U.S. Attorney

Reagan Vincent Reininger
Assistant U.S. Attorney

By electronic transmission to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to ECF Registrants above.

s/ Marny Hill